

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 04-36 Erie
	)	Civil No. 08-157 Erie
MAURICE FRANCIS FOLEY	)	

**GOVERNMENT'S MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO DEFENDANT'S MOTION TO VACATE JUDGMENT**

AND NOW comes the United States of America, by and through its counsel, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Christian A. Trabold, Assistant United States Attorney for said district, and states as follows:

1. On May 22, 2008, the defendant, Maurice Foley, acting *pro se*, filed a Motion to Vacate Judgment pursuant to 28 U.S.C. § 2255.

2. On May 23, 2008, this Court issued an Order directing the Government to file its Response on or before June 23, 2008.

3. On June 12, 2008, the Government filed a Motion for Discovery of Attorney-Client Records seeking information necessary to respond to the defendant's claims of ineffective assistance of counsel.

4. This Court scheduled a hearing on the Government's motion for discovery for July 24, 2008, and therefore, the Government will need an extension of time within which to respond to the defendant's motion.

WHEREFORE, the Government respectfully requests an additional 90 days to respond to the defendant's motion to vacate.

Respectfully submitted,

MARY BETH BUCHANAN  
United States Attorney

/s/ Christian A. Trabold  
CHRISTIAN A. TRABOLD  
Assistant U.S. Attorney  
PA ID No. 75013